



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 - (217) 782-3397

JAMES R. THOMPSON CENTER, 100 WEST RANDOLPH, SUITE 11-300, CHICAGO, IL 60601 - (312) 814-6026

217/524-3300 ROD R. BLAGOJEVICH, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

April 23, 2007

Certified Mail  
7004 2510 0001 8616 6164

Detrex Corp. Solvent & Env. Svc.  
Attn: Environmental Coordinator  
2537 Lemoyne Avenue  
Melrose Park, Illinois 60160

US EPA RECORDS CENTER REGION 5



1000550

Re: 0311860003 -- Cook County  
Detrex Corp. Solvent & Env. Svc.  
ILD074424938  
RCRA Permit

Dear Environmental Coordinator:

The Illinois EPA and the United States Environmental Protection Agency (U.S. EPA) have compiled a list of all facilities deemed appropriate and important to address using the Resource Conservation and Recovery Act's (RCRA) Corrective Action Program. Because this set of 3,880 facilities has national remediation goals which will culminate in the year 2020, it is referred to as the 2020 Corrective Action Universe. Your facility is part of this 2020 Universe.

As a result, a final remedy needs to be in place (i.e., remedy construction completed) at your facility by 2020 (although actual attainment of cleanup goals through remedy implementation may take a while longer). If we have not already done so, we will be working with you to develop a plan and a schedule that achieves this goal before 2020.

Your facility has been included in the 2020 Universe because one or more of the following is true:

- It has a RCRA permit obligation,
- Illinois EPA and U.S. EPA agreed that it needs to be addressed under the RCRA Corrective Action Program, as it at one time operated a hazardous waste management unit subject to the interim status or permit requirements of RCRA.

Inclusion on this list does not imply failure on your part to meet any legal obligation, nor should it be construed as an adverse action against you. It only means that Illinois EPA and U.S. EPA have identified your facility - and every other facility in the 2020 Universe - as needing to complete RCRA Corrective Action if they have not done so already. Our national program goal is to address these cleanup obligations before the end of 2020. Accordingly, progress will be tracked for each facility in the 2020 Universe. The list of facilities will be posted on our web site at <http://www.epa.gov/correctiveaction> in the near future.

ROCKFORD - 4302 North Main Street, Rockford, IL 61103 - (815) 987-7760 • DES PLAINES - 9511 W. Harrison St., Des Plaines, IL 60016 - (847) 294-4000  
ELGIN - 595 South State, Elgin, IL 60123 - (847) 608-3131 • PEORIA - 5415 N. University St., Peoria, IL 61614 - (309) 693-5463  
BUREAU OF LAND - PEORIA - 7620 N. University St., Peoria, IL 61614 - (309) 693-5462 • CHAMPAIGN - 2125 South First Street, Champaign, IL 61820 - (217) 278-5800  
SPRINGFIELD - 4500 S. Sixth Street Rd., Springfield, IL 62706 - (217) 786-6892 • COLLINSVILLE - 2009 Mall Street, Collinsville, IL 62234 - (618) 346-5120  
MARION - 2309 W. Main St., Suite 116, Marion, IL 62959 - (618) 993-7200

Page 2

Illinois EPA will work to address remediation concerns at your facility in a manner consistent with your plans for the property. There are a variety of options available for completing the required remediation efforts at your facility, ranging from participation in Illinois EPA's Site Remediation Program to establishment of an Administrative Order on Consent with USEPA under Section 3008(h) of RCRA.

Illinois EPA would like to schedule a meeting with you in the near future to discuss remedial activities at your facility and achievement of the goal mentioned in the second paragraph of this letter. Please contact James K. Moore, P.E. of my staff at 217/524-3295 if you have any questions regarding this letter and to schedule a meeting to discuss the contents of this letter.

Sincerely,



Stephen F. Nightingale, P.E.  
Manager, Permit Section  
Bureau of Land

SFN:JKM:bjh\072572s.dot

cc: Hak Cho, USEPA, Region 5



A DAMES & MOORE GROUP COMPANY

June 6, 1997

Mr. Jim Moore  
RCRA Permits/Land Permits  
Bureau of Land No. 33  
Illinois Environmental Protection Agency  
1001 North Grand East  
Springfield, Illinois 62702

Bill JKH  
WTE

38505 Country Club Drive  
Suite 100  
Farmington Hills, MI 48331-3403  
810 488 1177 Tel  
810 488 0416 Fax

Re: Summary Site Report and TACO  
(Tiered Approach to Corrective  
Action Objectives) Tier 2 Analysis  
for the Detrex RCRA Facility  
Located at 2537 LeMoyne Avenue  
Melrose Park, Illinois

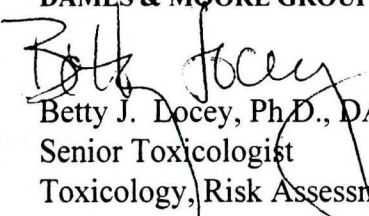
Dear Mr. Moore:

It was a pleasure speaking with you this week about outstanding issues at the Detrex Corporation's (Detrex's) facility located at 2537 LeMoyne Avenue in Melrose Park, Illinois. Our conference call on June 3, 197 (participants, Mr. Jim Moore [IEPA], Mr. Issa H. Shamiyeh [Detrex], Mr. Stan Miles [Detrex], Mr. David Craig [Detrex], and Dr. Betty Locey [Dames & Moore]) was productive. As we discussed, Dames & Moore will be evaluating the data collected thus far to characterize the Detrex facility. As agreed, Dames & Moore will provide a report to you on behalf of Detrex by June 30, 1997 that includes a summary of the data collected at the facility and a Tier 2 TACO analysis. This report will be used as a basis for discussion, future planning and decision making at the site.

I would like to thank you for your flexibility regarding the report deadline. I look forward to working with you. If you need any additional information, feel free to contact me at (810) 488-1177.

Sincerely,

**DAMES & MOORE GROUP**

  
Betty J. Locey, Ph.D., DABT (on behalf of the Detrex Corporation)  
Senior Toxicologist  
Toxicology, Risk Assessment and Statistics Group

cc Mr. Issa H. Shamiyeh  
Mr. Stan Miles  
Mr. David Craig

**RECEIVED**

**JUN 12 1997**

IEPA-BOL  
PERMIT SECTION



ILD 074 424 938

cc: Maywood  
USEPA

JIM  
WTS



# DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111

EXECUTIVE OFFICE

TELEPHONE: (810) 358-5800

FAX: (810) 358-5803

Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62794-9276  
Attn. Mr. William T. Sinnott II

July 25, 1995

Re: RCRA Facility Investigation, Detrex Corporation - Melrose Park, IL

Dear Mr. Sinnott,

It was a pleasure discussing the Phase II RFI for Detrex' Melrose Park facility with you today. As you will recall from our conversation, Detrex would like to request an extension of the deadline for completion of the RFI at the facility of 90 days. The reason for the request is that to date, Detrex has been unable to act on the most recent correspondence regarding the requirements for implementing the Phase II RFI. This is due to a serious automobile accident Mr. William Moore, our Manager of RCRA Compliance, had back in December which debilitated him for several months. Additionally Detrex has been in the process of obtaining Access Agreements from all adjacent property owners, the last was just obtained recently.

Upon determining that Detrex is behind in implementing the provisions of the RFI and the most recent correspondence regarding the RFI, I have contacted Mr. Ed Roberts of CRA in order to update/revise the RFI Workplan as per your correspondence. Upon receipt of the revision, I will review it and expediently notify our Consultant to implement the Workplan. It is anticipated that the Workplan can be implemented as soon as possible with an expected completion within 90 days, with the summary reports to be furnished by December 1, 1995.

In closing, on behalf of Detrex, I would like to take this opportunity to thank you for your patience and understanding as we diligently attempt to resolve this situation. If you have any questions, concerns or comments, please feel free to contact me at your earliest convenience.

Sincerely,

Ronald E. Swan, Jr. - CHMM, PE

Manager of Corporate Engineering

cc. Mr. Ed Roberts - CRA

I. H. Shamiyeh - Detrex

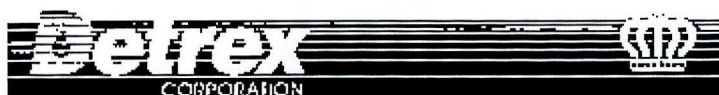
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JUL 27 1995

IEPA - BOL  
PERMIT SECTION

iepa1.doc





EXPERIENCE, PERFORMANCE, SOLUTIONS

## Profile

Since 1920, Detrex has been dedicated to meeting the specialized needs of industry with a wide variety of products and services. Detrex is well positioned to maintain its competitive advantage with a philosophy that stresses quality products combined with exemplary service. Our over 10,000 customers are proof that this philosophy is sound.

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The corporation is publicly held and its shares are traded on the NASDAQ exchange - symbol DTRX, headquartered in Southfield, Michigan. Detrex Corporation was founded as a manufacturer of alkaline cleaners. Today it has grown to \$100 million in sales, employs 350 people and is comprised of the following operations:

**Harvel Plastics, Inc.** produces normal and high impact rigid PVC pipe, solid bar, heavy wall tubular and angular stock, and custom extrusions. Harvel operations are located in Easton, Pennsylvania.

**The Elco Corporation** is a wholly-owned subsidiary headquartered in Cleveland, Ohio. Elco is engaged in three distinct business activities:

- *Petroleum additives for hydraulic fluids, industrial gear oils and metalworking fluids.*
- *Pharmaceutical intermediates.*
- *Various chemical products, including analytical and semi-conductor grades of hydrochloric acid, N-Methyl Pyrrole and Pyrrole.*

**The Detrex Solvents and Equipment Divisions** serve the gross metal cleaning markets and are headquartered in Southfield, Michigan.

- *The Equipment Division, located in Bowling Green, Kentucky, supplies equipment for complex industrial cleaning. This includes vapor degreasers, ultrasonic cleaners, aqueous cleaners and solvent vapor recovery modules.*
- *The Solvents Division with 10 locations nationwide, distributes and recycles metal cleaning solvents. In addition, we are licensed to transport and dispose of a variety of industrial wastes.*

**Seibert-Oxidermo, Inc.**, a wholly-owned Detrex subsidiary is headquartered in Romulus, Michigan. It produces industrial and automotive coatings, enamels for automotive parts, primers for plastics and underbody paint. Both solvent and water-borne formulations are available.

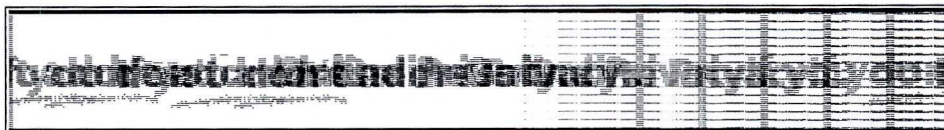
**RTI Laboratories Division** provides a comprehensive selection of analytical and environmental laboratory services at its Livonia, Michigan location.

Our customers include manufacturers of automobiles, farm implements, appliances and ordinance materials as well as computers, telecommunications, aerospace and optical products. Detrex is proud to maintain a tradition of supplying high-quality goods and services to industries which serve such a wide spectrum of consumers.

Review Our Stock Summary On The **NASDAQ** Exchange.



## Maps

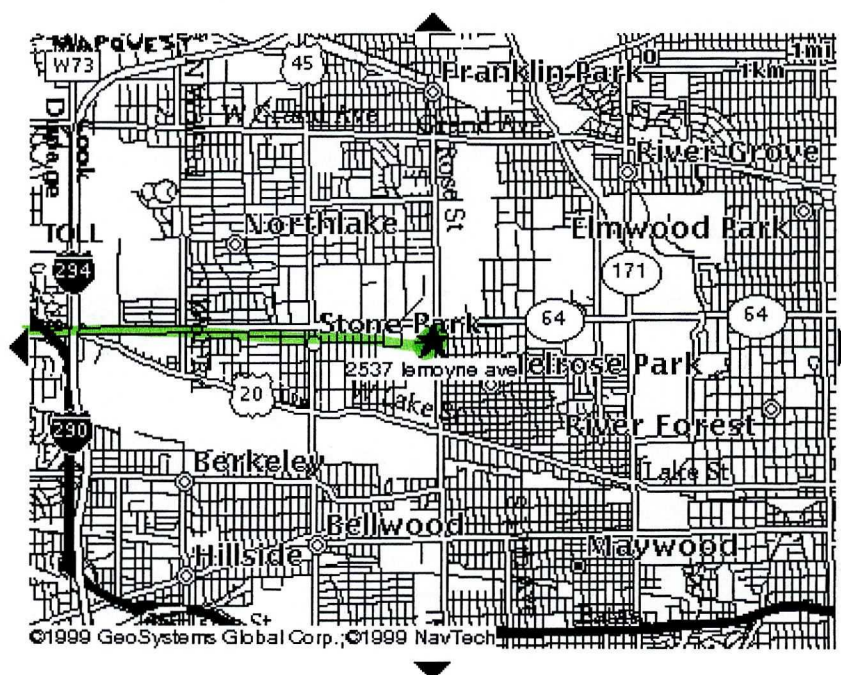
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113-CA-1

**CRA**

Consulting Engineers

cc: Maywood  
USEPA

J/K  
WTL

**CONESTOGA-ROVERS & ASSOCIATES LIMITED**

651 Colby Drive  
Waterloo, Ontario, Canada N2V 1C2  
(519) 884-0510 Colby Office Fax: (519) 884-0525  
(519) 725-3313 Bathurst Office (519) 725-1394

August 31, 1994

Reference No. 5222

Douglas W. Clay, P.E.  
Hazardous Waste Branch Manager  
Permit Section, Bureau of Land  
Illinois Environmental Protection Agency  
2200 Churchill Road  
Springfield, IL 62794-9276

RECEIVED  
WMD RECORD CENTER

OCT 04 1994

Dear Mr. Clay:

Re: Phase II RCRA Facility Investigation  
Detrex Corporation  
Melrose Park, Illinois  
IEPA No. 0311860003  
USEPA No. ILD074424938

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SEP 1 - 1994

PERMIT SECTION

This letter serves to provide you with written responses to your letter, dated June 15, 1994, addressed to Detrex Corporation, and also presents a RCRA Facility Investigation (RFI) Phase II Work Plan for the above referenced facility. Based on an August 10, 1994 telephone conversation between Mr. Ed Roberts of Conestoga-Rovers & Associates (CRA) and Mr. Bill Sinnott, of Illinois Environmental Protection Agency (IEPA), the IEPA granted Detrex Corporation a two week extension, until August 31, 1994, to submit the RFI Phase II Work Plan.

The remainder of this letter provides specific written responses to each of IEPA's conditions, as presented in the June 15, 1994 letter.

Condition 1

*It appears that there has been a release to the environment from the 1) Waste Handling Area, 2) Fuel Spill Area, 3) Tank Car Unloading Area and 4) Potential Underground Tank Area. As such, the facility needs to develop a work plan for a Phase II Investigation. The goal of the Phase II Work Plan should be to determine the extent of soil contamination at each SWMU.*

August 31, 1994

Reference No. 5222

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### Response

A RFI Phase II Work Plan has been prepared and four copies are enclosed for IEPA review. The RFI Phase II Work Plan has been designed to determine, in conjunction with the RFI Phase I data, the extent of soil contamination at the facility and also to perform a groundwater investigation at the facility.

### Condition 2

*Attachment E of the Part B permit issued to the subject facility outlines the procedures that should be followed when developing a Phase II Work Plan. The Phase II investigation should be sufficient to determine the horizontal and vertical extent of soil which contains contaminants above the concentrations identified in Condition 7 below.*

### Response

The RFI Phase II Work Plan has been prepared in accordance with Attachment E of the Part B permit and is sufficient to determine the horizontal and vertical extent of soil which contains contaminants above concentrations identified in Condition 7. It is to be noted, as discussed below in response to Condition 7, the concentration units listed for the levels of concern, under Condition 7, should be mg/kg instead of µg/kg.

### Condition 3

*In the Agency's September 10, 1993, Condition 5.a informs the facility that Volatile Organic Compounds must be analyzed for by Method 8240 of SW-846. It appears as though this condition was not followed. As such, the Phase II Work Plan must provide analysis of all compounds listed in Method 8240 of SW-846.*

### Response

As discussed in Sections 5.2 and 5.3 of the RFI Phase II Work Plan, all samples collected for volatile organic compound analysis will be analyzed for all compounds listed in Method 8240 of SW-846.

August 31, 1994

Reference No. 5222

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#### Condition 4

*Page 6 of the Phase I report states "The fuel oil tank located beneath the office area was abandoned in place in accordance with an approved closure plan. The closure plan was originally approved by the State Fire Marshall on July 19, 1986. Closure was completed in April 1991." This unit had not been identified previously as a SWMU by Detrex Corporation. With this new information in mind, it appears as though the facility should complete an SWMU Assessment Report in accordance with the Part B RCRA permit. This report should include, among other things, either (1) results of the analyses conducted on soil from around the former tank location or (2) a plan for collecting and analyzing soil samples from around the former tank location.*

#### Response

The draft RCRA Part B permit, dated September 25, 1991, proposed by IEPA, listed the underground fuel oil tank at the facility as a SWMU (see Section III.B.4 of draft permit). Detrex Corporation provided written responses, dated November 18, 1994 to IEPA on the draft permit and subsequently provided additional information, on March 27, 1992, to the IEPA concerning closure of the above referenced tank. The final Hazardous Waste Management Permit, effective date November 4, 1992, acknowledged in the Response to Comments, that the tank was closed in accordance with the closure plan approved by the Office of the State Fire Marshall, and that this SWMU will be eliminated from the final permit (see Agency Response to Comment 2 in Final Hazardous Waste Management Permit).

Section 2.2 of the RCRA Facility Investigation Phase I Work Plan, Detrex Corporation, Melrose Park, Illinois", (RFI Phase I Work Plan) dated March 1993 identified the underground fuel oil tank located beneath the office area as a former SWMU and discussed that the SWMU was closed in accordance with an approved closure plan (as agreed to by the Agency in the final Hazardous Waste Management Permit).

#### Condition 5

*The report uses the proposed corrective action levels set forth in the proposed 40 CFR 264, Subpart S regulations in the July 27, 1990 Federal Register in*



August 31, 1994

Reference No. 5222

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*determining whether a Phase II investigation is necessary. These proposed regulations have never been finalized, and thus it is inappropriate to use them in making this determination. The State of Illinois provided USEPA with substantial comments indicating that, for a variety of reasons, these values were much too high. It is apparent that USEPA must have realized that the proposed corrective action levels were inappropriate, as almost four years has passed and it has yet to finalize these corrective action levels. It must also be noted that the proposed action levels referenced by Detrex did not take into account the impacts such residual soil contamination would have on any underlying groundwater.*

#### Response

Condition 5 is acknowledged, however, it should be noted that based on discussions with the "RCRA Hotline", the USEPA is currently planning on finalizing the proposed 40 CFR 264, Subpart S, Appendix A - Criteria for Action Levels, on October 25, 1994. If and when the proposed regulations are finalized it will be appropriate to consider the final corrective action levels when determining corrective action is necessary and the appropriate corrective action levels.

#### Condition 6

*Insufficient information was provided regarding the acceptable levels of polynuclear aromatic hydrocarbons which could be left in the soil. Of special concern is the following:*

- a. The references in Table E.2 are not detailed enough for the Agency to obtain copies of the information being referenced;*
- b. The values for urban soils range several orders of magnitude in some cases. As such, it is inappropriate to use such wide ranges in evaluating the PNA labels detected in the soil at this facility. Any comparison to "typical" values should be made to site-specific background values obtained from collecting and analyzing a minimum of ten samples from areas on-site not affected by the operations of the facility.*

August 31, 1994

Reference No. 5222

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### Response

- a. Table E.2, Appendix E of the RFI Phase I Report has been revised to provide a complete list of references. A copy of this appendix is included in Appendix F of the enclosed RFI Phase II Work Plan.
- b. The RFI Phase II Work Plan has been designed to provide for the collection of background soil samples for PAH analyses. Due to the limited size of the facility (the building, loading/unloading dock and external tank farm occupy approximately 94 percent of the total property), background soil samples for PAH analyses will be collected off site, in the immediate vicinity of the facility (see Section 5.2.2 of RFI Phase II Work Plan).

### Condition 7

*Given the concerns expressed above, the Phase II investigation to be completed by Detrex should be sufficient to determine the horizontal and vertical extent of soil that contains contaminants in excess of the values set forth in the following table:*

Constituent PNAs	Level of Concern ( $\mu\text{g/kg}$ )
Acenaphthene	42.0
Anthracene	210.0
Benzo(a)anthracene	0.013
Benzo(a)pyrene	0.023
Benzo(b)fluoranthene	0.018
Benzo(k)fluoranthene	0.017
Chrysene	0.15
Dibenzo(a,h)anthracene	0.03
Fluoranthene	28.0
Fluorene	28.0
Indeno(1,2,3-c,d)pyrene	0.043
Naphthalene	0.039
Pyrene	21.0
Acenaphthylene	21.0
Benzo(g,h,l)perylene	
Phenanthrene	

August 31, 1994

Reference No. 5222

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*Halogenated Volatile Compounds (VOCs) ( $\mu\text{g/kg}$ )*

<i>1,1-Dichloroethane</i>	<i>3.5</i>
<i>1,2-Dichloroethane</i>	<i>0.025</i>
<i>1,1-Dichloroethene</i>	<i>0.035</i>
<i>cis-1,1-Dichloroethene</i>	<i>0.2</i>
<i>trans-1,2-Dichloroethene</i>	<i>0.5</i>
<i>Methylene Chloride</i>	<i>0.025</i>
<i>Tetrachloroethene</i>	<i>0.025</i>
<i>1,1,1-Trichloroethane</i>	<i>1.0</i>
<i>Trichlorethene</i>	<i>0.025</i>

Response

As discussed and agreed to between Mr. Ed Roberts (CRA) and Mr. Bill Sinnott (IEPA) during a telephone call on August 10, 1994, the concentration units listed above for the levels of concern should be mg/kg instead of  $\mu\text{g/kg}$ . As such the RFI Phase II Work Plan has been designed to sufficiently determine the horizontal and vertical extent of soil contamination in excess of the values set forth in Condition 7, modified to reflect the correct concentration units.

Condition 8

*The values set forth in Condition 7 are not the final cleanup objectives or target levels which will be used to determine if corrective action is necessary at any of the SWMUs at the subject facility. Such values will only be developed after the RFI is completed.*

Response

Condition 8 is acknowledged.



August 31, 1994

Reference No. 5222

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Condition 9

*Final soil cleanup objectives shall be established after the RFI is complete. These final objectives will determine the need for an extent of soil remediation (soil corrective action) at each SWMU.*

- a. The Agency will provide the Permittee with guidance regarding the development of final cleanup objectives along with its approval of the final RFI report.*
- b. In general, the procedures to be used in developing the proposed cleanup objectives must:*
  - 1. Consider the distance from the subject SWMUs to potential receptors;*
  - 2. Consider incorporate the 35 III. Adm. Code 620 groundwater standards into the development of the objectives;*
  - 3. Assess the potential threats the proposed objectives will have on human health and the environment;*
  - 4. Contain, as necessary, a site-specific and a contaminant specific risk assessment which demonstrates that the proposed final soil cleanup objectives will not (1) allow the groundwater quality standards of 35 III. Adm. Code 620 to be exceeded or (2) pose a threat to human health or the environment.*
- c. The Permittee and the Agency shall meet prior to the time that the Permittee begins developing these objectives. The goal of this meeting will be to provide the Permittee with guidance regarding the procedure which should be followed in developing and proposing these final soil cleanup objectives.*
- d. The Agency will establish final cleanup objectives if none are proposed by the Permittee.*
- e. Final Agency action taken on the development of and establishment of these final objectives will be subject to the appeal provisions of Section 39(a) of the Illinois Environmental Protection Act.*

August 31, 1994

Reference No. 5222

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Response

Condition 9 is acknowledged.

Condition 10

*The fifth paragraph in Section 5.4 indicates that groundwater was encountered at depths between seven and thirteen feet below ground surface. As such, a groundwater investigation must be included in the Phase II Work Plan. The groundwater investigation portion of the Phase II Work Plan must be developed in accordance with Attachment E to the Detrex final RCRA permit.*

Response

The RFI Phase II Work Plan has been designed to include a groundwater investigation developed in accordance with Attachment E of the Part B Permit.

Should you have any questions, do not hesitate to contact Mr. Bill Moore (Detrex Corporation) at 810-358-5800 or Mr. Ed Roberts at 519-884-0510.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Ed Roberts, P. Eng.  
ER/mc/1

Encl.

c.c. Bill Moore, Detrex

**CRA**

Consulting Engineers

**CONESTOGA-ROVERS & ASSOCIATES LIMITED**

651 Colby Drive

Waterloo, Ontario, Canada N2V 1C2

(519) 884-0510 Colby Office Fax: (519) 884-0525

(519) 725-3313 Bathurst Office (519) 725-1394

August 10, 1994

Reference No. 5222

Mr. William T. Sinnott II  
Illinois Environmental Protection Agency  
Division of Land Pollution Control #33  
Permit Section  
2200 Churchill Road  
P.O. Box 19276  
Springfield, Illinois 62794-9276

**FAKED**  
AUG 10/94

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SEP 20 1994

Dear Mr. Sinnott:

Re: Detrex Corporation Facility  
Melrose Park Illinois  
IEPA No. 0311860003  
USEPA No. ILD 074424938

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AUG 16 1994

This letter serves to confirm our telephone conversation today. Conestoga-Rovers & Associates (CRA) on behalf of Detrex Corporation (Detrex), requested that Illinois Environmental Protection Agency (IEPA) grant Detrex until August 31, 1994 to submit the Phase II Work Plan for the above reference facility. IEPA granted the extension until August 31, 1994.

Detrex is currently in the process of obtaining legal access agreements for adjacent properties to its facility. These are required to determine the horizontal and vertical extent of contamination. Upon receipt of signed access agreements, Detrex will notify IEPA that access has been obtained. Conversely, should an adjacent property owner refuse to sign an access agreement to allow soil borings to be completed on its property, Detrex will contact IEPA and ask for its assistance in obtaining the necessary access.

As also discussed during our telephone conversation today, the concentration units listed for the levels of concern, under Condition 7 of IEPA's June 15, 1994 letter to Detrex, should be mg/kg instead of µg/kg.



August 10, 1994

Reference No. 5222

-2-

Should you have any questions, do not hesitate to call Mr. Bill Moore of Detrex Corporation at (313) 358-5800 or the undersigned at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Ed Roberts, P. Eng.  
ER/cf/6

Encl.

c.c. Bill Moore, Detrex Corporation



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

June 15, 1994

Detrex Corporation  
Attn: Bill Moore  
Post Office Box 5111  
Southfield, Michigan 48086-5111

Re: 0311860003 -- Cook County  
Detrex Corporation  
ILD074424938  
Date Received: March 21, 1994  
Log No. B113

Dear Mr. Moore:

The RCRA Facility Investigation (RFI) Phase I Report for the above referenced facility submitted on behalf of Detrex Corporation by Ed Roberts, P.E. of Conestoga-Rovers and Associates, Ltd. has been reviewed by this Agency. This report is hereby approved subject to the following conditions and modifications.

1. It appears that there has been a release to the environment from the 1) Waste Handling Area, 2) Fuel Spill Area, 3) Tank Car Unloading Area and 4) Potential Underground Tank Area. As such, the facility needs to develop a workplan for a Phase II Investigation. The goal of the Phase II Workplan should be to determine the extent of soil contamination at each SWMU.
2. Attachment E of the Part B permit issued to the subject facility outlines the procedures that should be followed when developing a Phase II workplan. The Phase II investigation should be sufficient to determine the horizontal and vertical extent of soil which contains contaminants above the concentrations identified in Condition 7 below.
3. In the Agency's September 10, 1993, Condition 5.a informs the facility that Volatile Organic Compounds must be analyzed for by Method 8240 of SW-846. It appears as though this condition was not followed. As such, the Phase II Workplan must provide analysis of all compounds listed in Method 8240 of SW-846.
4. Page 6 of the Phase I report states "The fuel oil tank located beneath the office area, was abandoned in place in accordance with an approved closure plan. The closure plan was originally approved by the State Fire Marshall on July 19, 1986. Closure was completed in April 1991." This unit had not been identified previously as a SWMU by Detrex Corporation. With this new information in mind, it appears as though the facility should complete

a SWMU Assessment Report in accordance with the Part B RCRA permit. This report should include, among other things, either (1) results of the analyses conducted on soil from around the former tank location or (2) a plan for collecting and analyzing soil samples from around the former tank location.

5. The report uses the proposed corrective action levels set forth in the proposed 40 CFR 264, Subpart S regulations in the July 27, 1990 Federal Register in determining whether a Phase II investigation is necessary. These proposed regulations have never been finalized, and thus it is inappropriate to use them in making this determination. The State of Illinois provided USEPA with substantial comments indicating that, for a variety of reasons, these values were much too high. It is apparent that USEPA must have realized that the proposed corrective action levels were inappropriate, as almost four years has passed and it has yet to finalize these corrective action levels. It must also be noted that the proposed action levels referenced by Detrex did not take into account the impacts such residual soil contamination would have on any underlying groundwater.
6. Insufficient information was provided regarding the acceptable levels of polynuclear aromatic hydrocarbons which could be left in the soil. Of special concern is the following:
  - a. The references in Table E.2 are not detailed enough for the Agency to obtain copies of the information being referenced;
  - b. The values for urban soils range several orders of magnitudes in some cases. As such, it is inappropriate to use such wide ranges in evaluating the PNA labels detected in the soil at this facility. Any comparison to "typical" values should be made to site-specific background values obtained from collecting and analyzing a minimum of ten samples from area on-site not affected by the operations of the facility.
7. Given the concerns expressed above, the Phase II investigation to be completed by Detrex should be sufficient to determine the horizontal and vertical extent of soil contains contaminants in excess of the values set forth in the following table:

<u>Constituent PNAs</u>	<u>Level of Concern (ug/kg)</u>
Acenaphthene	42.0
Anthracene	210.0
Benzo(a)anthracene	0.013
Benzo(a)pyrene	0.023
Benzo(b)fluoranthene	0.018
Benzo(k)fluoranthene	0.017
Chrysene	0.15



3-113  
cc: William Moore  
USEPA  
JK.  
JTS

# DETREX CORPORATION

P.O. Box 5111, Southfield, MI 48086-5111

March 22, 1994

FAX: (313) 358-5803

TELEPHONE:  
(313) 358-5800

Mr. William T. Sinnott  
Illinois Environmental Protection Agency  
Division of Land Pollution Control #33  
Permit Section  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

RE: Detrex Corporation  
Melrose Park, Illinois  
IEPA No. 0311860003  
USEPA No. ILD 074 424 938

0.2.6

Dear Mr. Sinnott:

Enclosed are the certifications mentioned in Mr. Ed Roberts of Conestoga-Rovers & Associates letter of March 17, 1994. These certifications are by the owner/operator, analytical laboratory and independent registered professional engineer.

If there are any questions, please do not hesitate to contact me.

Sincerely,

*William M. Moore, Jr.*  
William M. Moore, Jr.  
Corporate Manager  
Environmental Compliance

cc: Ed. Roberts, CRA  
facility

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MAR 24 1994

PERMIT SECTION

Laboratory Certification Statement  
Phase I of the RCRA Facility Investigation  
Detrex Corporation  
Melrose Park, Illinois  
Log No. B-113

Upon completion of Phase I of the RFI this statement is to be completed by both a responsible officer of the owner or operator (as defined in 35 IAC 702.126) and (2) a responsible officer (as defined in 35 IAC 702.126) of the laboratory which conducted the chemical analyses required as part of Phase I of the RFI. The original of this statement shall accompany the original certification statement for the overall Phase I activities and the RFI Phase I Report.

The applicable sample, handling, preservation, preparation and analysis conducted as part of the Phase I of the RFI at the facility described in this document has been conducted in accordance with the specifications in the approved Workplan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine imprisonment for knowing violations.

ILD 074424938

USEPA ID Number

Ferd J. Chmielnicki

Signature of Owner/Operator

Date

Detrex Corporation, Melrose Park, IL

Facility Name

Ferd J. Chmielnicki, Corporate Secretary

Name and Title of Owner/Operator  
Representative

Recra Environmental, Inc.

Name of Laboratory

Robert K. Wyeth

Signature of Laboratory

Responsible Officer

3/16/94

Date

Robert K. Wyeth, Laboratory Director

Name and Title of Laboratory  
Responsible Officer

Mailing Address of Laboratory:

10 Hazelwood Drive

Suite 106

Amherst, NY 14228

B-113-RF1-1

**CRA**

Consulting Engineers

cc: Maywood  
USEPA

JKH  
WTS

**CONESTOGA-ROVERS & ASSOCIATES LIMITED**

651 Colby Drive

Waterloo, Ontario, Canada N2V 1C2

(519) 884-0510 Colby Office Fax: (519) 884-0525

(519) 725-3313 Bathurst Office (519) 725-1394

March 17, 1994

Reference No. 5222

Mr. William T. Sinnott  
Illinois Environmental Protection Agency  
Division of Land Pollution Control #33  
Permit Section  
2200 Churchill Road  
P.O. Box 19276  
Springfield, Illinois 62794-9276

RECEIVED MAR 31 1994  
WMD RCRA  
RECORD CENTER

Dear Mr. Sinnott:

Re: Detrex Corporation, Melrose Park Illinois  
IEPA No. 0311860003  
USEPA No. ILD 074424938

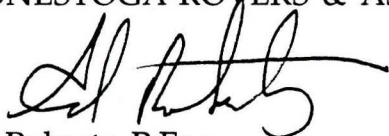
In accordance with the requirements of the Hazardous Waste Management RCRA Part B Permit for the above referenced facility, please find enclosed three (3) copies of the report entitled "RCRA Facility Investigation Phase I Report". This report has been prepared by Conestoga-Rovers & Associates on behalf of Detrex Corporation.

As discussed between yourself and Ed Roberts on March 17, 1994, Certification by the owner/operator, analytical laboratory and the independent registered professional engineer will be forwarded under separate cover early next week.

Should you have any questions, do not hesitate to call Mr. Bill Moore of Detrex Corporation at (313) 358-5800 or the undersigned at your convenience.

Yours truly,

CONESTOGA-ROVERS & ASSOCIATES



Ed Roberts, P.Eng.

ER/cf/5

Encl.

c.c. Bill Moore, Detrex Corporation  
Issa Shamiyeh, Detrex Corporation  
Ralph H. Markert, Detrex Corporation  
Bruce Monteith, CRA

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MAR 21 1994

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State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

USEPA

Mary A. Gade, Director  
217/524-3300

2200 Churchill Road, Springfield, IL 62794-9276

September 10, 1993

Detrex Corporation  
Attn: Bill Moore  
Post Office Box 5111  
Southfield, Michigan 48086-5111

Re: 0311860003 -- Cook County  
Detrex Corporation  
ILD074424938  
Date Received: August 12, 1993  
Log No. B113

Dear Mr. Moore:

This is in response to the August 6, 1993 submittal made on behalf of Detrex Corporation by Ed Roberts, P.E. of Conestoga-Rovers and Associates, Limited has been reviewed by this Agency. Mr. Robert's submittal requested that several modifications be made to the Agency's June 17, 1993 approval letter regarding the Phase I RFI Workplan for the above-referenced facility. These modifications and the overall Phase I RFI Workplan for the subject facility are hereby approved subject to the following conditions and modifications:

1. This RFI Phase I Workplan shall be carried out to investigate for possible releases from the following solid waste management units (SWMUs):

<u>SWMU NO.</u>	<u>NAME</u>
1	Waste Handling Area;
2	Fuel Spill Area;
3	Tank Car Unloading Area; and
Tentatively Identified	Potential Underground Tank Area (Immediately west of the outdoor Virgin Products Tank diked area).

2. Except as modified in the subject submittal and this approval letter, Phase I of the RFI carried out at the Detrex Corporation facility in Melrose Park shall be carried out in accordance with the plans received by the Agency on March 5, 1993 and April 16, 1993. The purpose of the activities described in the Phase I Workplan is to document the absence or presence of hazardous waste or constituents in the soils from the SWMUs listed above. Thus, the Workplan was reviewed with this in mind.
3. RFI Phase I activities must be completed by December 15, 1993. When Phase I is complete, the owner or operator must submit to the Agency certification both by the owner or operator and by an independent registered professional engineer that the facility completed Phase I in accordance with the specifications in the approved RFI Phase I Workplan. In addition, a certification meeting the requirements of 35 IAC 702.126 must be provided by a person of authority (as defined in 35 IAC 702.126) at the laboratory conducting the required chemical analyses that the requirements set forth in this letter were met during the chemical analysis of all samples. This certification by the laboratory must address the applicable preservation, handling, preparation and analytical requirements set forth in this letter. These certifications, along with the report described below must be received at this Agency by February 15, 1994. These dates may be extended if Detrex submits information to the Agency indicating that it is attempting to complete the required activities in a timely manner but needs additional time to complete the investigation.

The attached certification forms must be used. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the RFI.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5105 et. seq.) requires that any person who practices professional engineering in the State of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Section 1). Therefore, any certification or engineering services which are performed for a RFI Workplan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Section 13.1 of the Illinois Professional Engineering Act.

As part of the certification, to document the RFI Phase I activities at your facility, please submit a Phase I Report and Summary which includes, at a minimum:

- a. The information identified in Condition 15 below regarding the required soil sampling/analysis effort at each SWMU of concern.



- b. Information which the Workplan indicates will be in the report;
- c. A chronological summary of Phase I activities and the cost involved;
- d. Color photo documentation of Phase I activities; and
- e. A description of the qualifications of personnel performing and directing the RFI activities and general qualification information for contractors (e.g., laboratory drillers).
- f. Conclusions which can be reached based upon the collected information; and
- g. A general discussion of the actual activities which should be carried out as part of Phase 2 of the RCRA Facility Investigation.

The original and two (2) copies of all certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency  
Division of Land Pollution Control -- #33  
Permit Section  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

- 4. If the Agency determines that implementation of this RFI Workplan fails to satisfy the requirements of Section III of the RCRA Part B Permit (Log No. B-113), the Agency reserves the right to require that additional work be completed to satisfy these requirements. Revisions of RFI Workplans are subject to the appeal provisions of Section 40 of the Illinois Environmental Protection Act.
- 5. All soil samples shall be analyzed individually (i.e., no compositing). Analytical procedures shall be conducted in accordance with Test Methods for Evaluating Solid Wastes, Third Edition (SW-846). Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. All soil samples must be analyzed for:
  - a. Volatile organic compounds using Method 8240 of SW-846. All constituents listed in the Practical Quantitation Limits Table in this method must be analyzed for and the Practical Quantitation Limits in that table must be achieved, if at all possible.



- b. Polynuclear aromatic hydrocarbons using method 8310 of SW-846. All constituents listed in the Practical Quantitation Limits Table in this method must be analyzed for and the Practical Quantitation Limits in that table must be achieved, if at all possible.
6. To ensure the purpose of the Phase 1 investigation as described in Condition 1 above is achieved, additional soil samples must be collected at the following locations:
- a. One location adjacent to the catch basin at the loading dock (SWMU No. 1) and additional locations, as necessary, along joints, cracks or other defects in the loading dock base which would potentially allow hazardous waste or hazardous waste constituents to migrate through the base);
  - b. One surface soil location near the standpipe of the suspected underground storage tank (SWMU No. 4). If a storage tank is found to be present, at least two samples, locations to be selected based on field conditions observed (e.g. stained soils), will be collected from a test pit(s) excavated to determine the orientation and size of the tank. Soil samples collected from this location will be analyzed for VOCs using Method 8240 and for PAHs using Method 8310 (SW-846, Third Edition)."
  - c. If it is determined during completion of boreholes BH6-93 through BH11-93, that hazardous waste or constituents are not present in the soils at SWMU No. 3, the following additional borehole locations will be required to demonstrate the absence of hazardous waste or hazardous constituents in the soils at SWMU No. 3:
    - 1. Three additional locations north of the railroad tracks at SWMU No. 3;
    - 2. Two additional locations south of the railroad tracks at SWMU No. 3; and
    - 3. One additional location west of Sample BH7-93 and SWMU No. 3.";
- Collection and analysis of these additional samples shall be carried out in accordance set forth in the approved Workplan and this letter.
7. An attempt shall be made to advance one soil boring to a depth of 50', dependent upon capabilities of drilling equipment utilized, to obtain preliminary general information about the subsurface, geology/hydrogeology at the facility.

8. The following procedure must be utilized in the collection of all required soil samples:
  - a. The procedures used to collect the soil samples must be sufficient so that all soil encountered is classified in accordance with ASTM Method D-2488.
  - b. If a drill rig or similar piece of equipment is necessary to collect required soil samples, then:
    1. the procedures specified in ASTM Method D-1586 (Split Spoon Sampling) or D-1587 (Shelby Tube Sampling) must be used in collecting the samples.
    2. Soil samples must be collected continuously at several locations to provide information regarding the shallow geology of the area where the investigation is being conducted;
  - c. All soil samples which will be analyzed for volatile organic compounds (VOCs) must be collected in accordance with Attachment 7 of the Agency's RCRA closure plan instructions;
  - d. Soil samples not collected explicitly for VOC analysis should be field-screened for the presence of VOCs at all locations where VOCs are a concern;
  - e. All other soil samples must be collected in accordance with the procedures set forth in SW-846; and
  - f. When visually discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination.
9. Quality assurance/quality control procedures which meet the requirements of SW-846 must be implemented during all required sampling/analysis efforts. In addition, sample collection, handling, preservation, preparation and analysis must be conducted in accordance with the procedures set forth in SW-846 and the requirements set forth in this letter.
10. The Illinois Pollution Control Board recently finalized regulations establishing groundwater quality standards for the State of Illinois (see 35 IAC 620). As such, the Agency must ensure that the soil cleanup objectives established for this facility will not cause any future violations of these standards. Therefore, unless site specific



information is submitted to the Agency to indicate otherwise, soil cleanup objectives for this site will be based upon the protection of Class I groundwater (potable resource groundwater). In addition, any required groundwater cleanup objectives will also be developed assuming Class I groundwater, unless sufficient information is provided to indicate otherwise.

11. Any equipment, including heavy earth movers or smaller tools, shall be scraped to remove any residue. Following this, the equipment must be steam cleaned and triple rinsed. All residues, wash and rinse water shall be collected and managed as a hazardous waste if analysis of the waste detects the presence of hazardous constituents or it exhibits a characteristic of hazardous waste. In any event the material must be managed as a special waste.
12. The Health and Safety Plan contained in the subject Workplan is neither approved nor disapproved. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
13. Reports must be prepared and submitted to the Agency which describe the activities completed each quarter of the calendar year while the Phase I investigation is being carried out. The quarterly reports shall contain at a minimum:
  - a. An estimate of the percentage of the investigation completed;
  - b. Summary of activities completed during the reporting period;
  - c. Summaries of all actual or proposed changes to the Workplan or its implementation;
  - d. Summaries of all actual or potential problems encountered during the reporting period;
  - e. Proposal for correcting any problems;
  - f. Projected work for the next reporting period; and
  - g. Other information or data as requested in writing by the Agency's DLPC.



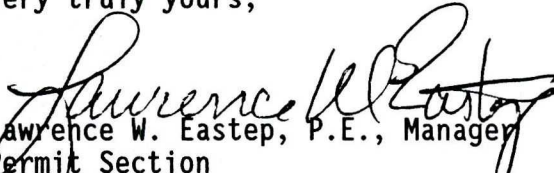
- g. Other information or data as requested in writing by the Agency's DLPC.
14. A quarterly report for the work completed from the date of this letter to September 30, 1993 must be submitted to the Agency by October 31, 1993. Subsequent quarterly reports must be submitted in a similar manner until the final Phase I RFI Report required by Condition 2 above is submitted to the Agency. The Agency acknowledges receipt of the initial report for the quarter ending June 30, 1993.
15. The portion of the final RFI Phase I report documenting the results of the required soil sampling/analysis effort must contain the following information, for each SWMU investigated:
- a. A discussion of (1) the reason for the sampling/analysis effort conducted at each SWMU and (2) the goals of the sampling analysis effort conducted at each SWMU;
  - b. A scaled drawing showing the horizontal and vertical location where all soil samples were collected at each SWMU;
  - c. Justification for the locations from which soil samples were collected;
  - d. A description of the procedures used for:
    - 1. Sample collection;
    - 2. Sample preservation;
    - 3. Chain of custody; and
    - 4. Decontamination of sampling equipment.
  - e. Visual classification of each soil sample collected for analysis;
  - f. A discussion of the results of any field screening efforts;
  - g. A description of the soil types encountered during the investigation, including scaled cross-sections;
  - h. A description of the procedures used to analyze the soil samples, including:
    - 1. The analytical procedure used, including the procedures, if any, used to prepare the sample for analysis;
    - 2. Any dilutions made to the original sample;

4. The practical quantitation limit achieved, including justification for reporting PQLs which are above those set forth in SW-846.
  - i. A description of all quality control/quality assurance analyses conducted, including the analysis of lab blanks, trip blanks and field blanks;
  - j. A description of all quality assurance/quality control efforts made overall;
  - k. A summary of all analytical data, including QA/QC results, in tabular form;
  - l. Copies of the final laboratory sheets which report the results of the analyses, including final sheets reporting quality assurance/quality control data;
  - m. Colored photographs documenting the sampling effort; and
  - n. A discussion of the collected data. This discussion should identify those sample locations where contaminants were detected and the concentrations of the contaminants. Conclusions which can be drawn from the information compiled should also be included in this discussion.
16. If the Agency's DLPC determines, based on the data obtained from the Phase I Workplan activities, that there has been no release of hazardous waste or hazardous constituents to the environment from a SWMU identified in Condition 1 above, then no further investigative action will be required for that SWMU. If the Agency's DLPC determines, based on the data, that there has been a release of hazardous waste or hazardous constituents to the environment or that the data is inconclusive, the Permittee will be notified by the Agency's DLPC. (Refer to Section III, Subsection C of the Part B Permit).
17. If Detrex conducts a Phase I investigation which differs from the described above, then it must provide adequate justification in the report required by Condition 2 above for the variances. As stated in Condition 1 above, the Agency feels that the requirements set forth in this letter are necessary to reach a conclusion that there has not been a release from a given SWMU. If the goals of Detrex are somewhat different than this, then there may be justification for varying from the requirements set forth in this letter.

18. All references to the "Agency's RCRA closure plan instructions" refer to the document entitled Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities, December 11, 1990. A copy of this document is enclosed.

Should you have any questions regarding this matter, please contact William T. Sinnott II at 217/524-3300.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control  
Bureau of Land

LWE:WTS:lat/sp/419Y,1-9

Attachments: RFI Phase I Certification Statements (2)  
Instructions for the Preparation of Closure Plans  
for Interim Status RCRA Hazardous Waste Facilities

cc: USEPA Region V -- George Hamper



B-113

cc: Maywood  
USEPA

JKA  
JTS

**CRA**

Consulting Engineers

**CONESTOGA-ROVERS & ASSOCIATES LIMITED**

651 Colby Drive  
Waterloo, Ontario, Canada N2V 1C2  
(519) 884-0510 Colby Office Fax: (519) 884-0525  
(519) 725-3313 Bathurst Office (519) 725-1394

August 6, 1993

Reference No. 5222

Mr. Jim Moore  
Illinois Environmental Protection Agency  
Division of Land Pollution Control #24  
Planning and Reporting Section  
2200 Churchill Road  
P.O. Box 19276  
Springfield, Illinois 62794-9276

Dear Mr. Moore:

Re: RCRA Facility Investigation Phase I Work Plan  
Detrex Corporation, Melrose Park RFI Program

This letter serves to provide the Illinois Environmental Protection Agency (IEPA) with clarification of conditions (see IEPA approval letter dated June 17, 1993) discussed at our meeting on July 23, 1993.

Condition 1 - (last paragraph)

It was agreed that the purpose of the RFI is to document the absence or presence of hazardous waste or hazardous constituents in the groundwater, surface water sediments, soils and air from the SWMUs, however, the focus of the Phase I Work Plan is on soil. It is suggested that the first sentence on the top of Page 2 be revised as follows:

"The purpose of the activities described in the Phase I Work Plan is to 'document the absence or presence of hazardous waste or hazardous constituents in the soils' from the SWMUs listed above."

Condition 2 - (first paragraph)

It was discussed that the laboratory will not provide certification to sample collection as this would be conducted by CRA representatives. It is suggested that the fourth sentence in the first paragraph be revised as follows:

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August 6, 1993

Reference No. 5222

-2-

"This certification by the laboratory must address the applicable sample preservation, handling, preparation and analytical requirements set forth in this letter."

Condition 2 - (Item e)

It was agreed the qualifications that will be provided for contractor personnel (e.g. laboratory, drillers) will consist of a qualifications package for the subcontractor and not necessarily the individual performing the work. It is suggested that Condition 2.e be revised as follows:

"e. A description of the qualifications of personnel performing and directing the RFI activities and general qualification information for contractors (e.g. laboratory, drillers)."

Condition 4

As discussed the only materials managed at the Detrex Corporation facility since operations commenced in 1974 have included the following:

Perchloroethylene;  
1,1,1-Trichloroethane;  
Trichloroethylene;  
Methylene Chloride;  
Freon 113; and  
Heating/Fuel oils.

With regards to the solvents, Detrex sells product solvents to clientele and also accepts spent/used solvents (F001, F002) of the same types from clientele. The waste solvents would only be managed at the Waste Handling Area (SWMU No. 1). Product solvents were managed at the Waste Handling Area and the Tank Car Unloading Area (SWMU No. 1 and No. 3). The heating/fuel oils were only managed in the former above ground tank near the Fuel Oil Spill area (SWMU No. 2) and the closed underground fuel storage tank. Although the waste solvents are also dually classified as D-series wastes, this dual classification has only recently been utilized to ensure compliance should any of the waste solvents received contain any metals. Detrex does not accept wastes that are solely classified as D-series wastes. It is suggested that the last sentence of Condition 4 be deleted.



August 6, 1993

Reference No. 5222

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#### Condition 5

It was agreed that a minimum of two soil samples, based on field observations (e.g. stained soils), will be collected in the vicinity of the potential underground tank area. It is suggested that Condition 5.b be revised as follows:

"b. One surface soil location near the standpipe of the suspected underground storage tank (SWMU No. 4). If a storage tank is found to be present, at least two samples, locations to be selected based on field conditions observed (e.g. stained soils), will be collected from a test pit(s) excavated to determine the orientation and size of the tank. Soil samples collected from this location will be analyzed for VOCs using Method 8240 and for PAHs using Method 8310 (SW-846, Third Edition)."

It was also agreed to, that in order for Detrex to demonstrate the absence of hazardous waste or hazardous constituents in the soils at SWMU No. 3, the six additional locations specified by Condition 5.c, 5.d and 5.e would be required. However, these specific locations may not be required if the presence of contamination is determined, during completion of the proposed borehole locations as specified in the Phase I Work Plan. It is suggested that Condition 5.c, 5.d and 5.e be revised and combined into one condition as follows:

"c. If it is determined during completion of boreholes BH6-93 through BH11-93, that hazardous waste or constituents are not present in the soils at SWMU No. 3, the following additional borehole locations will be required to demonstrate the absence of hazardous waste or hazardous constituents in the soils at SWMU No. 3:

- three additional locations north of the railroad tracks at SWMU No. 3;
- two additional locations south of the railroad tracks at SWMU No. 3; and
- one additional location west of Sample BH7-93 and SWMU No. 3."

#### Condition 6

It was discussed that depth to groundwater in vicinity of the Site is approximately ten feet. It was agreed that an attempt will be made to advance one borehole to a depth of approximately fifty feet, dependent upon the capabilities of the drilling equipment to be used. It is suggested that the first sentence of Condition 6 be revised as follows:



August 6, 1993

Reference No. 5222

-4-

"An attempt will be made to advance one soil boring to a depth of fifty feet, dependent upon capabilities of drilling equipment utilized, to obtain preliminary general information about the sub-surface, geology/hydrogeology at the facility."

#### Condition 8

It was agreed that Condition 8 would be deleted since the focus of the Phase I Work Plan is to determine the absence or presence of hazardous waste or hazardous constituents in the soil from the SWMUs and not to define the horizontal and vertical extent of contamination, if present.

#### Condition 10

It was discussed that only SWMU No. 1 had a concrete surface which historically could have been exposed to a release from the SWMU. SWMU No. 2 has a new concrete surface which was placed after removal of asphalt and soils in this area and SWMU No. 3 does not have a concrete/asphalt surface. It was agreed that since the focus of the Phase I Work Plan is to determine the absence or presence of hazardous waste or hazardous constituents in the soil from the SWMUs, that the cleaning of the concrete surface within SWMU No. 1 will not be required at this time. It was also discussed that sampling conducted in the area of SWMU No. 1 will consist of a least four sample locations based on the integrity of the base. It is suggested that Condition 10 be deleted and that Condition 5.a be revised as follows:

"a. One location adjacent to the catch basin at the loading dock (SWMU No. 1) and additional locations, dependent upon base conditions observed (e.g. joints, cracks, or other defects which would potentially allow hazardous waste or hazardous constituents to migrate through the base)."

#### Condition 20

Condition 20 should be deleted since Section V of the RCRA Part B Permit already specifies that "Detrex shall cover the manhole located in the driveway with a polypropylene cover before loading.(unloading of special waste)."

The above clarifications are intended to reflect the discussions and agreements reached during our meeting on July 23, 1993. Should you have any questions or should the clarifications not accurately represent the discussions and agreements,